

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

**IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEM PRODUCTS LIABILITY LITIGATION**

**MDL NO. 2327**

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THIS DOCUMENT RELATES TO THE CASE(S)  
LISTED ON THE EXHIBIT ATTACHED HERETO:

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**JOINT MOTION TO DISMISS DEFENDANTS WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibit A and Defendants Sofradim Production SAS,<sup>1</sup> Tissue Science Laboratories Limited,<sup>2</sup> and Covidien LP<sup>3</sup> (collectively the “Covidien entities”) and C. R. Bard, Inc., to the extent they are named as Defendants, advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims.

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<sup>1</sup> Sofradim Production SAS includes any incorrect or incomplete spellings of this Defendant, including Sofradim Corporation, Sofradim Corp., Sofradim Production, and Sofradim Production, SAS.

<sup>2</sup> Tissue Science Laboratories Limited includes any incorrect or incomplete spellings of this Defendant, including Tissue Sciences Laboratories, Tissue Science Laboratories Ltd., Tissue Science Laboratories, Inc., Tissue Science Laboratories, Limited and Tissue Science Laboratories, Ltd.

<sup>3</sup> Covidien LP includes any incorrect or incomplete spellings of this Defendant, as well as any improperly named affiliates of this defendant, including Covidien Holding, Inc., Covidien Inc., Covidien Incorporated, Covidien International Finance, SA, Covidien LLC, Covidien Ltd., Covidien Trevoux, SCS, Covidien plc, Covidien, Inc., Covidien, LLC, and Covidien, PLC, Tyco Healthcare Group LP, TYCO Healthcare, Tyco Healthcare Group, L.P., Tyco International Ltd, United States Surgical Corporation, United States Surgical Corp., Floreane Medical Implants SA, Floreane Medical Implants, SA, Mareane, SA, Mareane SA, Medtronic PLC, International Technology, Inc., Medtronic MiniMed, Inc., Medtronic Puerto Rico Operations Co., Medtronic Sofamor Danek USA, Inc., Medtronic Sofamor Danek, Inc., Medtronic Sofamor Danek, USA, Inc., Medtronic USA, Inc., Medtronic, Inc. and Medtronic, Inc.

Accordingly, all parties jointly move the Court to dismiss, with prejudice, and terminate from the docket of the court, the actions listed on the attached Exhibit A, with each party to bear its own costs.

Respectfully submitted this 9th day of April 2019.

/s/ Richard B. North, Jr.  
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*Counsel for Plaintiffs on Exhibit A*

**EXHIBIT A – MOSTYN LAW**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>Case Name</b>
2:14-cv-30686	Bosley, Josephine
2:14-cv-31466	Arvanitis, Nancy
2:15-cv-08733	Alexander, Dorothy
2:15-cv-13767	Pine, Patricia
2:16-cv-01229	Medina, Samia and Cesar
2:17-cv-02379	Schilling, Patrice

**CERTIFICATE OF SERVICE**

I hereby certify that on this 9th day of April, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By: /s/ Micah L Hobbs  
Micah L. Hobbs  
Attorney for Covidien Entities